

REMARKS

I. Introduction

Claims 13 to 25 are pending in the present application. In view of the foregoing amendments and the following remarks, it is respectfully submitted that all of the presently pending claims are allowable, and reconsideration is respectfully requested.

II. Rejection of Claims 13 to 16 Under 35 U.S.C. § 102(b)

Claims 13 to 16 were rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 5,366,562 ("Schwarze et al."). It is respectfully submitted that Schwarze et. al does not anticipate these claims for at least the following reasons.

Claim 13 relates to a low-pressure spray module for spray cleaning a component, including: a receiver tank for holding a flushing medium, an inlet side of the receiver tank being pressurized using compressed air from a compressed air source; a spray lance for pressurized spraying of the component using the flushing medium, the spray lance being connected to an outlet side of the receiver tank; a collection tank positioned for collecting contaminant-particles-containing flushing medium after the pressurized spraying of the component; and an analysis filter coupled to an outflow side of the collection tank, the analysis filter positioned remotely from the collection tank and connected to the collection tank via a line. The contaminant-particles-containing flushing medium is extracted from the collection tank through the outflow side using a vacuum pump. The analysis filter performs filtering of contaminant particles from the contaminant-particles-containing flushing medium. The analysis filter **collects** the contaminant particles for later analysis.

According to the Final Office Action, filter 25 described by Schwarze et al. constitutes an analysis filter. However, according to Schwarze et al., filter 25 is provided for **removing** rubber that has been removed by a brittle impact method and not dissolved in water. There is no disclosure or suggestion by Schwarze that the filter 25 **collects** contaminant particles, for later analysis or otherwise. Accordingly, it is plainly apparent that Schwarze et al. does not disclose, or even suggest, all of the features included in claim 13. Consequently, it is respectfully submitted that Schwarze does not anticipate claim 13, or any of claims 14 to 16, which ultimately depend from claim 13.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

III. Rejection of Claims 17 and 18 Under 35 U.S.C. § 103(a)

Claims 17 and 18 were rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of Schwarze et al. and U.S. Patent Application Publication No. 2003/0010852 ("Schommer"). It is respectfully submitted that the combination of Schwarze et al. and Schommer does not render these claims unpatentable for at least the following reasons.

Claims 17 and 18 ultimately depend from claim 13 and therefore include all of the features included in claim 13. As set forth in more detail above, Schwarze et al. does not disclose, or even suggest, all of the features of claim 13, from which claims 17 and 18 ultimately depend. Schommer is not relied upon for disclosing the features of claim 13 not disclosed by Schwarze et al.. Accordingly, it is respectfully submitted that the combination of Schwarze et al. and Schommer does not render unpatentable claims 17 and 18, which ultimately depend from claim 13.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

IV. Rejection of Claim 19 Under 35 U.S.C. § 103(a)

Claim 19 was rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of Schwarze et al. and U.S. Patent No. 5,228,467 ("Gilliam, Jr. et al."). It is respectfully submitted that the combination of Schwarze et al. and Gilliam, Jr. et al. does not render this claim unpatentable for at least the following reasons.

Claim 19 depends from claim 13 and therefore include all of the features of claim 13. As set forth above, Schwarze et al. does not disclose, or even suggest, all of the features of claim 13. Gilliam, Jr. et al. does not disclose, or even suggest, the features of claim 13 not disclosed or suggested by Schwarze et al. Accordingly, it is respectfully submitted that the combination of Schwarze et al. and Gilliam, Jr. et al. does not render unpatentable claim 19, which depends from claim 13.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

V. Rejection of Claims 20, 21 and 25 Under 35 U.S.C. § 103(a)

Claims 20, 21 and 25 were rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of U.S. Patent Application Publication No. 2004/0107782 ("Bradley et al."), French Patent Application Publication No. 2 704 780 ("Viel") and Schwarze et al. It is respectfully submitted that the combination of Bradley et al., Viel and Schwarze et al. does not render these claims unpatentable for at least the following reasons.

Claim 20 includes features analogous to claim 13 and has been amended herein without prejudice to recite that contaminant particles, which are filtered out of the contaminant-particles-containing flushing medium by the analysis filter, are collected by the analysis filter and to recite that the method includes analyzing the filter to analyze contaminant particles filtered out and collected by the analysis filter. According to the Final Office Action, hydrophilic filter 54 described by Bradley et al. constitutes an analysis filter. In paragraph [0064], Bradley et al. states that "the hydrophilic filter 54 could be removed from the unit, and incubated to the used to provide testing material to test for the presence of the contaminant of interest, such as microorganism, chemicals, or radioactivity." There is no mention, however, that the hydrophilic filter 54 is analyzed to analyze contaminant particles filter out and collected thereby. Neither Viel nor Schwarze et al. cures this deficiency.

Accordingly, it is respectfully submitted that the combination of Bradley et al., Viel, and Schwarze does not render unpatentable claim 20, or either of claims 21 and 25, which depend from claim 20.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

VI. Rejection of Claim 22 Under 35 U.S.C. § 103(a)

Claim 22 was rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of Bradley et al., Viel, Schwarze et al. and Schommer. It is respectfully submitted that the combination of Bradley et al., Viel, Schwarze et al. and Schommer does not render this claim unpatentable for at least the following reasons.

Claim 22 ultimately depends from claim 20 and therefore includes all of the features included in claim 20. As more fully set forth above, the combination of Bradley et al., Viel, and Schwarze et al. does not render unpatentable claim 20, from

which claim 22 ultimately depends. Schommer does not cure the critical deficiencies noted above. As such, it is respectfully submitted that the combination of Bradley et al., Viel, Schwarze et al., and Schommer does not render unpatentable claim 22.

Accordingly, withdrawal of this rejection is respectfully requested.

VII. Rejection of Claim 23 Under 35 U.S.C. § 103(a)

Claim 23 was rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of Bradley et al., Viel, Schwarze et al., Schommer and U.S. Patent No. 5,925,193 ("Bude et al."). It is respectfully submitted that the combination of Bradley et al., Viel, Schwarze et al., Schommer and Bude et al. does not render this claim unpatentable for at least the following reasons.

Claim 23 depends from claim 20 and therefore includes all of the features of claim 20. As set forth above, the combination of Bradley et al., Viel, and Schwarze et al. does not disclose, or even suggest, all of the features of claim 20. In addition, Bude et al. does not cure the deficiencies of Bradley et al., Viel, and Schwarze et al. Accordingly, it is respectfully submitted that the combination of Bradley et al., Viel, Schwarze et al., Schommer and Bude et al. does not render unpatentable claim 23, which depends from claim 20.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

VIII. Rejection of Claim 24 Under 35 U.S.C. § 103(a)

Claim 24 was rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of Bradley et al., Viel, Schwarze et al. and U.S. Patent No. 4,020,676 ("Nuxhall et al."). It is respectfully submitted that the combination of Bradley et al., Viel, Schwarze et al. and Nuxhall et al. does not render this claim unpatentable for at least the following reasons.

Claim 24 depends from claim 20 and therefore includes all of the features of claim 20. As set forth above, the combination of Bradley et al., Viel and Schwarze et al. does not disclose, or even suggest, all of the features of claim 20. Nuxhall et al. does not cure the critical deficiencies noted above. Accordingly, it is respectfully submitted that the combination of Bradley et al., Viel, Schwarze et al. and Nuxhall et al. does not render unpatentable claim 24, which depends from claim 20.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

IX. Conclusion

In light of the foregoing, Applicants respectfully submit that all pending claims are in condition for allowance. Prompt reconsideration and allowance of the present application are therefore earnestly solicited.

Respectfully submitted,

Dated: July 2, 2009

By /Clifford A. Ulrich/

Clifford A. Ulrich (Reg. No. 42,194)

KENYON & KENYON LLP
One Broadway
New York, NY 10004
Telephone: (212) 425-7200
Facsimile: (212) 425-5288
CUSTOMER NO. 26646